

FILED

NOV 12 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WHITNEY HEMPHILL,

Defendant.

No.

4:20CR00717 HEA/JMB

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about January 20, 2020, within the Eastern District of Missouri, the defendant,

WHITNEY HEMPHILL,

in a matter within the jurisdiction of the Social Security Administration, a department of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, in a document entitled "Representative Payee Report," she did state and represent and cause to be stated and represented that her minor child's, C.H.'s, Social Security benefits had been used for C.H.'s care, when **WHITNEY HEMPHILL** well knew, C.H. had been financially provided for by foster and adoptive parents from November 2015 through September 2019.

In violation of Title 18, United States Code, Section 1001(a).

COUNT TWO

From on or about October 20, 2015 through September 6, 2019, within the Eastern District of Missouri, the defendant,

WHITNEY HEMPHILL,

did embezzle, steal, purloin, or knowingly convert to her use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: \$21,489.00 in the form of Social Security Administration benefit payments, as representative payee of C.H., creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN,
United States Attorney

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney